

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
NORTHERN DIVISION**

SHAWANNA NELSON

PLAINTIFF

VS.

NO. 1:04CV00037

CORRECTIONAL MEDICAL SERVICES et al

DEFENDANTS

PLAINTIFF'S RESPONSE TO CMS' MOTION FOR SUMMARY JUDGMENT

Comes the Plaintiff, Shawanna Nelson, by and through her lawyer, Cathleen V. Compton and for her Response to CMS's Motion to for Summary Judgment, states:

1. The legal standard set forth in Paragraph one is correct and so admitted. It is denied that CMS is entitled to Summary Judgment in that there exist issues of material fact.
2. The exhibits stated in Paragraph two of the Motion are in fact attached to the Motion.
3. Paragraph three is denied.

The Motion is not well taken and should be denied.

Respectfully submitted,

/s/ Cathleen Compton

Cathleen V. Compton, # 85031
114 South Pulaski
Little Rock, AR 72201
(501) 372-0080

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been mailed electronically this 4th day of January, 2007 to Alan Humphries, Humphries & Lewis, P.O. Box 9068, Pine Bluff, AR 71611, and Christine Cryer Boozer, Assistant Attorney General, 323 Center Street, Suite 1100, Little Rock, AR., 72201.

/s/ Cathleen Compton
Cathleen V. Compton